

Application No. 09/408,873

## REMARKS

The FINAL Office Action of August 26, 2004 has been carefully considered. Reconsideration of this application, as amended, is respectfully requested. Claims 18, 20 and 25-42 are pending in this application. Of these, claims 18, 25, and 29 are independent claims. An Amendment mailed September 29, 2003 amended claims 1, 9, 18, 21 and 29. An Amendment faxed February 5, 2004, which was entered by filing an RCE faxed March 5, 2004, amended claims 18 and 29 and canceled claims 1-17 and 21-24. An Amendment faxed June 9, 2004 amended claims 18 and 29-30, canceled claim 19, and added new claims 31-42. This Amendment amends claim 26 to correct a typographical error.

### 1. Response to Rejection Under 35 USC 103 of Claims 18, 20, 29-35, and 38-42

The Office Action in sections 5-13 on pages 3-7 rejects claims 18, 20, 29-35, and 38-42 under 35 USC 103(a) as being unpatentable over Taylor et al., U.S. 6,493,469 (hereinafter referred to as "Taylor") in view of Chevrette et al., U.S. Patent 5,774,179 (hereinafter referred to as "Chevrette"). (For the record, the Office Action in section 11 on page 6 fails to complete the citation of the rejection of claims 32, 33, 39, and 40, and subsequent sections 12 and 13 on page 7 fail to discuss any additional reference. Applicant thus assumes for the purpose of discussion, section 11 should be omitted from consideration.)

Taylor discloses a dual video camera system for scanning hardcopy documents that assembles a composite image by patching together overlapping images. Chevrette discloses a method for fast microscanning that uses a movable focus lens. As more fully discussed in the Amendment mailed September 29, 2003, which discussion is incorporated herein by reference, microscanning involves moving a lens a distance a fraction of a pixel pitch to record a microscanned image.

Applicant respectfully submits that the combination of Taylor and Chevrette is misplaced because their combination fails to disclose or suggest Applicant's claimed invention. Applicant (in part) claims in independent claims 18 and 29 a plurality of cameras that *simultaneously* record a plurality of camera images, where at least one camera has an offset lens. Microscanning disclosed by Chevrette does not concern the *simultaneous* scanning of images, instead it concerns the movement of a lens a distance to record each microscanned image.

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Further, Applicant submits that the combination of Taylor and Chevrette instead produces a dual camera system in which two microscanning cameras record overlapping images. Once recorded, the overlapping images may be assembled as a composite image as described in Taylor. However, such a combination fails to teach the *simultaneous* recording of a plurality of views as claimed by Applicant in independent claims 18 and 29.

Thus (assuming there exists some motivation or teaching to combine the teachings of Taylor and Chevrette) the combination of Taylor and Chevrette fails to disclose or suggest as claimed by Applicant in independent claims 18 and 29 producing a composite image of an area using *simultaneously* recorded images that are recorded with a plurality of cameras, where at least one of the cameras has an offset lens that produces an oblique field of view of the portion it records of the area.

Accordingly, Applicant respectfully submits that independent claims 18 and 29 are patentably distinguishable over Taylor in view of Chevrette. Insofar as claims 20, 30-35, and 38-42 are concerned, these claims depend from one of now presumably allowable independent claims 18 or 29 and are also believed to be in allowable condition.

## 2. Response to Rejection Under 35 USC 103 of Claims 25-28 and 36-37

The Office Action in sections 14-17 on pages 7-10 rejects claims 25-27 under 35 USC 103(a) as being unpatentable over Anderson US 6,657,667 B1 (hereinafter referred to as "Anderson") in view of Chevrette et al., U.S. Patent 5,744,179 (hereinafter referred to as "Chevrette"). In addition, the Office Action sets forth a response to Applicant's prior arguments in section 2 on pages 2-3 of the Office Action.

As set forth on page 8, lines 14-16, of the Office Action, "Anderson does not disclose a camera wherein the lens is positioned at an offset position within a plane substantially orthogonal to an optical axis of the lens", as claimed by Applicant in independent claim 25. Chevrette discloses a method for fast microscanning (as discussed above with reference to independent claims 18 and 29), where *a lens is moved* a distance to record each microscanned image. Instead, Applicant's invention recited in independent claim 25 describes a *camera* that rotates to allow a lens of the camera to record two different views within a plane that is substantially

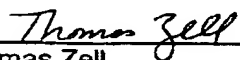
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charging of any necessary fees, other than the issue fee, to Xerox Corporation Deposit Account No. 24-0025. This also constitutes a request for any needed extension of time and authorization to charge all fees therefor to Xerox Corporation Deposit Account No. 24-0025.

#### 4. Conclusion

In view of the foregoing remarks, reconsideration of this application and allowance thereof are earnestly solicited. In the event the Examiner considers a personal contact advantageous to the disposition of this case, the Examiner is hereby requested to call Attorney for Applicant(s), Thomas Zell.

Respectfully submitted,

  
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Thomas Zell  
Attorney for Applicant(s)  
Registration No. 37,481  
Telephone: 650-812-4282  
Date: 10/26/04